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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ARA KESHISHYAN,

14 Defendant.

Case No.: 12-cr-4352-JLS

**RESPONSE IN OPPOSITION TO  
DEFENDANT'S MOTION TO  
MODIFY STANDARD CONDITION  
#1 OF SUPERVISED RELEASE**

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16 The UNITED STATES OF AMERICA, by and through its counsel Robert S.  
17 Brewer, United States Attorney, and Benjamin J. Katz, Assistant U.S. Attorney, files  
18 this Response in Opposition to Defendant's Motion to Modify Standard Condition #1  
19 of Supervised Release. [Dkt. No. 564.]

20 **I. FACTUAL BACKGROUND**

21 On September 12, 2014, this Court sentenced Ara Keshishyan ("Defendant"),  
22 who had pleaded guilty to Conspiracy to Commit Bank Fraud, to 57 months' custody  
23 to be followed by three years of supervised release. Defendant's supervision  
24 commenced on January 5, 2018. On April 24, 2019, Defendant filed his Motion to  
25 Modify Standard Condition #1 of Supervised Release ("Defendant's Motion"). In his  
26 motion, Defendant claims that being able to travel without getting advanced permission  
27 from Probation would allow him to "do [his] job more effectively." Def. Mot. at 5. He  
28

1 also references “some conferences and other events that I could benefit by attending.”  
2 *Id.* This response follows.

3 **II. ARGUMENT**

4 The United States opposes the Defendant’s Motion because it is unnecessary at this  
5 time. The undersigned has spoken to Defendant’s assigned Probation Officer, who reports  
6 that she rejected a similar request because Defendant was unable to provide any specific  
7 explanation as to how the travel restriction was adversely affecting his employment. The  
8 Probation Officer also noted that she is not aware of any travel requests from Defendant  
9 that have been denied to date. Furthermore, the Probation Officer stated that she regularly  
10 supervises individuals with employment that requires frequent travel on short notice, such  
11 as truck drivers, and that she is able to approve employment related travel like this without  
12 incident.

13 Defendant’s claims in his motion cites no specific examples of travel needs that  
14 cannot be met under the current conditions imposed. As such, based on the information  
15 received from his Probation Officer, the United States opposes Defendant’s Motion.

16 **III. CONCLUSION**

17 For the reasons stated above, the Court should deny Defendant’s Motion.

18 DATED: May 16, 2019

19 Respectfully submitted,

20 ROBERT S. BREWER  
21 United States Attorney

22 s/ Benjamin J. Katz  
23 BENJAMIN J. KATZ  
24 Assistant United States Attorney  
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